

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

LLOYDS TSB BANK PLC,

Defendant.
----- X

No. 07 Civ. 9235 (CSH)

**NOTICE OF MOTION BY
DEFENDANT LLOYDS
TSB BANK PLC TO
DISMISS THE
COMPLAINT**

PLEASE TAKE NOTICE, that upon the accompanying declarations of Marc J. Gottridge and Ursula Cassani, the respective exhibits thereto, and the accompanying memorandum of law, Lloyds TSB Bank plc, by its attorneys Lovells LLP, shall move this Court, before the Honorable Charles S. Haight, Jr., United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 17C, for an order dismissing the Complaint in its entirety for lack of subject matter jurisdiction, lack of personal jurisdiction and failure to state a claim upon which relief can be granted, pursuant to Federal Rules of Civil Procedure 12(b)(1), (2) and (6), and on the basis of principles of international comity, and for such other relief as the Court may deem just and proper.

Dated: New York, New York
January 25, 2008

LOVELLS LLP

By: 

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